

NB:CAO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 10-1369

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UNITED STATES OF AMERICA

- against -

SHAUN CRAY BROADIE,
also known as
"Shaun Gray Broadie,"

Defendant.

C O M P L A I N T

(T. 8, U.S.C.,
§§ 1326(a) and
1326(b)(2))

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EASTERN DISTRICT OF NEW YORK, SS:

KENNETH LOPEZ, being duly sworn, deposes and states that he is a Deportation Officer with the Immigration and Customs Enforcement, duly appointed according to law and acting as such.

On or about November 17, 2010, within the Eastern District of New York and elsewhere, the defendant SHAUN CRAY BROADIE, also known as "Shaun Gray Broadie" being an alien who had previously been arrested and convicted of an aggravated felony, to wit: possession with intent to traffic in cocaine, and was thereafter deported from the United States, and who had not made a re-application for admission to the United States to which the Secretary of the Department of Homeland Security, successor to the Attorney General, had expressly consented, was found in the United States.

(Title 8, United States Code, Section 1326(b)(2)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I am a Deportation Officer for the Immigration and Customs Enforcement ("ICE") and have been involved in the investigation of numerous cases involving the illegal re-entry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On September 8, 1975 Defendant SHAUN CRAY BROADIE was born in Jamaica.

3. On November 17, 2010, in West Hempstead, New York, officers for the Immigration and Customs Enforcement found SHAUN CRAY BROADIE residing in the home of his mother. Records checks revealed that he had been previously deported on October 23, 2003.

4. Records checks further revealed that, on or about February 6, 2001, SHAUN CRAY BROADIE pleaded guilty in North Carolina to possession of cocaine with intent to traffic.

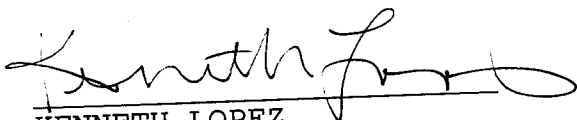
^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

5. As reflected United States Immigration Judge's order, SHAUN CRAY BROADIE was ordered deported. This order was carried out on or about October 23, 2003, in accordance with the warrant of removal of the same date.

6. I have reviewed SHAUN CRAY BROADIE's official immigration records, which reflects that he was deported from the United States to his home country of Jamaica for violation of the Immigration and Nationality Act, as a result of the aforementioned conviction.

7. A preliminary search of the Department of Homeland Security databases has revealed that there exists no request by the defendant SHAUN CRAY BROADIE for permission from the Secretary of the Department of Homeland Security, successor to the Attorney General, to re-enter the United States after deportation.

WHEREFORE, your deponent respectfully requests that the defendant SHAUN CRAY BROADIE, also known as "Shaun Gray Broadie," be dealt with according to law.



KENNETH LOPEZ
Deportation Officer
Immigration and Customs Enforcement

Sworn to before me this
17th day of November, 2010

THE HONORABLE ARLENE R. LINDSAY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK